

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

RULE 234 -- AUTOMOTIVE REFINISHING OPERATIONS

(Adopted 11-03-94) (Amended 8-24-95, 8-8-96, 4-9-98)

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100 GENERAL

- 101 PURPOSE:** To limit the emission of volatile organic compounds from finishing or refinishing of Group I and Group II Vehicles and Equipment as defined in this rule.
- 102 APPLICABILITY:** The provisions of this rule apply only to facilities located in the Sacramento Valley Air Basin portion of Placer County, as defined by California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 1.5, Article 1, Section 60106.
- 103 EXEMPTION FROM RULE 219:** The provisions of Rule 219, Organic Solvents, shall not apply to the refinishing of vehicles and equipment as defined in Rule 234.
- 104 EXEMPTION, TOUCH-UP:** The provisions of this rule shall not apply to touch-up operations.
- 105 EXEMPTION, GRAPHIC DESIGN APPLICATION:** The provisions of this rule shall not apply to application of graphic designs.
- 106 EXEMPTION, MILITARY VEHICLES AND GROUND SUPPORT EQUIPMENT:** The provisions of this rule shall not apply to the coating of military vehicles and ground support equipment.
- 107 EXEMPTION, RADIATORS:** The provisions of this rule shall not apply to the coating of radiators and engine parts.
- 108 EXEMPTION, AEROSOL PAINT PRODUCTS:** The provisions of this rule shall not apply to the application of aerosol paint products from non-refillable aerosol containers having a capacity of one liter (34 fluid ounces), or less.
- 109 LIMITED EXEMPTION, SELF-CONTAINED COATING APPLICATION:** The provisions of Section 302, shall not apply to the application of high viscosity or thixotropic coatings with application equipment that is supplied with and is an integral part of the coating container.
- 110 LIMITED EXEMPTION, SMALL PRODUCTION/UTILITY BODIES:** The provisions of Section 301, shall not apply to coatings applied to small production and utility bodies that must match the vehicles upon which they will be mounted. When production is less than or equal to 20 vehicles per day, any coating with a VOC content not in excess of the standards set forth in Section 301.1 can be used. If production is greater than 20 vehicles per day, any coating with a VOC content not in excess of the standards set forth in Section 301.2 can be used. Daily records shall be maintained on the number of utility bodies coated each day and such records shall be retained for the previous five (5) year period and be available at the time of inspection.

200 DEFINITIONS

- 201 AEROSOL PAINT PRODUCT:** A coating product containing pigments or resins that dispenses product ingredients by means of a propellant, and is packaged in a non-refillable can for hand-held application.
- 202 ANTIGLARE/SAFETY COATING:** A coating which minimizes light reflection for safety purposes.
- 203 CAMOUFLAGE COATING:** A coating applied on motor vehicles to conceal such vehicles from detection.
- 204 CAPTURE EFFICIENCY:** The fraction, in percent, of all VOC's generated by a process that are directed to an abatement or recovery device.
- 205 CONTROL EFFICIENCY:** The fraction, in percent, of pollution prevented by a control device and the pollution introduced to the control device.
- 206 CATALYST:** A substance whose presence initiates the reaction between chemical compounds.

- 207 COATING:** A material which is applied to a surface and which forms a film in order to beautify and/or protect such surface.
- 208 COLOR MATCH:** The ability of a repair coating to blend into an existing coating so that color difference is not visible.
- 209 ELECTROSTATIC APPLICATION:** The application of charged atomized paint droplets which are deposited by electrostatic attraction.
- 210 EXEMPT COMPOUNDS:** For the purpose of this Rule, exempt compounds are as defined in Rule 102, Definitions.
- 211 FINISHING:** The coating of incomplete vehicles, their parts and components, or mobile equipment for which the original coating was not applied from an Original Equipment Manufacturing (OEM) plant coating assembly line.
- 212 GRAMS OF VOC PER LITER OF COATING EXCLUDING WATER AND EXEMPT COMPOUNDS:** The weight of VOC per combined volume of VOC and coating solids. It can be calculated by the following equation:

$$G_{voc} = \frac{(W_s - W_w - W_{es})}{(V_m - V_w - V_{es})}$$

Where:

G_{voc}	=	Grams VOC per liter of coating excluding water and exempt compounds.
W_s	=	Weight of volatile compounds in grams.
W_w	=	Weight of water in grams.
W_{es}	=	Weight of exempt compounds in grams.
V_m	=	Volume of material in liters.
V_w	=	Volume of water in liters.
V_{es}	=	Volume of exempt compounds (as defined in Rule 102, <u>Definitions</u>), in liters.

- 213 GRAMS OF VOC PER LITER OF MATERIAL:** The weight of VOC per volume of material. It can be calculated by the following equation:

Install Equation Editor and double-click here to view equation.

- 214 GRAPHIC DESIGN APPLICATION:** The application of logos, letters, numbers and graphics to a painted surface, with or without the use of a template.
- 215 GROUND SUPPORT EQUIPMENT:** Vehicles used in support of aircraft activities at airports.
- 216 GROUP I VEHICLES:** Passenger cars, large/heavy duty truck cabs and chassis, light and medium duty trucks and vans, and motorcycles.

- 217 GROUP II VEHICLES:** Public transit buses and mobile equipment.
- 218 HIGH VOLUME, LOW PRESSURE (HVLP) SPRAY APPLICATOR:** Equipment used to apply coatings by means of a gun which is designed to be operated and which is operated between 0.1 and 10 psig air atomized pressure measured dynamically at the center of the air cap and at the air horns.
- 219 LACQUER:** A coating that dries primarily by solvent evaporation and is resolvable in its original solvent.
- 220 LARGE/HEAVY DUTY TRUCK:** A truck having a manufacturer's gross vehicle weight rating of over 30,000 pounds.
- 221 LIGHT AND MEDIUM DUTY TRUCK OR VAN:** A truck or van having a manufacturer's gross vehicle weight rating of 30,000 pounds or less.
- 222 METALLIC COATING TOPCOAT:** A coating which contains more than 5 g/l (0.042 lb/gal) of metal particles, as applied, where such particles are visible in the dried film.
- 223 MOBILE EQUIPMENT:** Equipment which may be drawn or is capable of being driven on rails or on a roadway, including, but not limited to, trains, railcars, truck bodies, truck trailers, camper shells, mobile cranes, bulldozers, street cleaners, golf carts and implements of husbandry.

- 224 MULTI STAGE TOPCOAT SYSTEM:** A topcoat system composed of either a basecoat-clearcoat, a basecoat-midcoat-clearcoat, or a groundcoat-basecoat-midcoat-clearcoat.

The VOC content of a basecoat-clearcoat coating system shall be calculated according to the following formula:

$$VOC_{Total} = \frac{VOC_{bc} + 2VOC_{cc}}{3}$$

The VOC content of a 3 Stage coating system shall be calculated according to the following

formula:

$$VOC_{Total} = \frac{VOC_{bc} + VOC_{mc} + 2VOC_{cc}}{4}$$

The VOC content of a 4 Stage coating system shall be calculated according to the following formula:

$$VOC_{Total} = \frac{VOC_{gc} + VOC_{bc} + VOC_{mc} + 2VOC_{cc}}{5}$$

Where:

- VOC_{Total} = The sum of the VOC content, as applied and used to determine compliance with Section 301.
- VOC_{gc} = The VOC content, as applied, of a pigmented groundcoat or tinted primer sealer.
- VOC_{bc} = The VOC content, as applied, of a pigmented basecoat.
- VOC_{mc} = The VOC content, as applied, of a translucent midcoat.
- 2VOC_{cc} = Two times the VOC content, as applied, of a transparent clearcoat.

- 225 PRECOAT:** A coating which is applied to bare metal primarily to deactivate the metal surface prior to application of a subsequent water-base primer surfacer. Effective January 1, 1997, a precoat shall be a coating that dries by oxidation or chemical polymerization. A precoat must not be a lacquer product. Purchase invoices must be retained to verify that usage of precoat is no more than 25%, by volume, of primer/surfacer usage.
- 226 PRETREATMENT WASH PRIMER:** A coating which contains a minimum of 0.5 percent acid by weight to provide surface etching, and which is applied directly to bare metal surfaces to provide corrosion resistance and topcoat adhesion.
- 227 PRIMER:** A coating applied prior to the application of a topcoat for the purpose of corrosion resistance and adhesion of the topcoat. Primer surfacer and primer sealer shall be considered a primer when applied to Group II vehicles.
- 228 PRIMER SEALER:** A coating applied for the purpose of sealing the underlying metal or coating system prior to the application of a topcoat.
- 229 PRIMER SURFACER:** A coating applied prior to the application of a topcoat for the purpose of corrosion resistance, adhesion of the topcoat, and which promotes a uniform surface by filling in surface imperfections.
- 230 REDUCER:** The solvent used to thin enamel.
- 231 REFINISHING:** The coating of vehicles, their parts and components, or mobile equipment, including partial body collision repairs, for the purpose of protection or beautification and which is subsequent to the original coating applied at an Original Equipment Manufacturing (OEM) plant coating assembly line.
- 232 SPECIALTY COATING:** A unique coating containing additives which are necessary due to unusual job performance requirements. Specialty coatings include, but are not limited to, adhesion promoters, uniform finish blenders, elastomeric materials, gloss flatteners, bright metal trim repair, and anti-glare/safety coatings.
- 233 TEMPORARY PROTECTIVE COATING:** A coating applied to areas adjacent to those being

painted, for the purpose of protecting those areas from overspray. The temporary protective coating is removed after primer or topcoat applications.

- 234 TOPCOAT:** A coating applied over a primer, primer system, or an original OEM finish for the purpose of protection or appearance. For the purposes of this rule, solid color and metallic topcoats are single stage applications, the VOC_{Total} of a multi stage topcoat system will determine compliance with VOC standards in Section 301.
- 235 TOUCH-UP:** The application of a coating by brush, air brush, or hand held, non-refillable aerosol cans, to repair minor surface damage and imperfections less than four square feet in area.
- 236 TRANSFER EFFICIENCY:** The ratio of the amount of coating solids adhering to the object being coated to the total amount of coating solids used in the application process, expressed as a percentage.
- 237 UTILITY BODY:** A special purpose service compartment or unit that will be bolted, welded, or affixed onto an existing cab and chassis. The compartment may serve as storage for equipment or parts.
- 238 VOLATILE ORGANIC COMPOUND (VOC):** Any chemical compound containing at least one atom of carbon except for the Exempt Compounds listed in Rule 102, Definitions.

300 STANDARDS

- 301 LIMITS:** Any person who applies coatings to Group I or II vehicles, mobile equipment, or their parts and components, shall comply with Sections 301.1 and 301.2 of this rule, as applicable.

301.1 Group I Vehicles: A person shall not refinish Group I Vehicles (or Group II Vehicles where color match is required), or their parts and components, using any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating as applied, excluding water and exempt compounds (as defined in Rule 102) unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an overall control efficiency (capture and control), as determined in Sections 506.4 and 506.5, of at least 85 percent and which has been approved in writing by the Air Pollution Control Officer. Pursuant to Section 302, any person seeking to utilize such abatement equipment shall submit an Operation and Maintenance Plan at least 90 days in advance of the date on which abatement equipment control is to be used in lieu of compliance with VOC content limitations. Submittal of an application for Authority to Construct per Rule 501, General Permit Requirements, will also be required.

COATING	JANUARY 1, 1996 VOC	JANUARY 1, 1997 VOC	JANUARY 1, 1998 VOC
Pretreatment Wash Primer	780 g/l (6.5 lbs/gal)	780 g/l (6.5 lbs/gal)	780 g/l (6.5 lbs/gal)
Precoat	780 g/l (6.5 lbs/gal)	600 g/l (5.0 lbs/gal)	600 g/l (5.0 lbs/gal)
Primer/Primer Surfacer	720 g/l (6.0 lbs/gal)	340 g/l (2.8 lbs/gal)	250 g/l (2.1 lbs/gal)
Primer Sealer	720 g/l (6.0 lbs/gal)	600 g/l (5.0 lbs/gal)	420 g/l (3.5 lbs/gal)
Solid Color Topcoat	720 g/l (6.0 lbs/gal)	600 g/l (5.0 lbs/gal)	420 g/l (3.5 lbs/gal)
Metallic Topcoat	720 g/l (6.0 lbs/gal)	600 g/l (5.0 lbs/gal)	520 g/l (4.3 lbs/gal)

COATING	JANUARY 1, 1996 VOC	JANUARY 1, 1997 VOC	JANUARY 1, 1998 VOC
Specialty Coating	840 g/l (7.0 lbs/gal)	840 g/l (7.0 lbs/gal)	840 g/l (7.0 lbs/gal)
Multi Stage Topcoat System	720 g/l (6.0 lbs/gal)	600 g/l (5.0 lbs/gal)	540 g/l (4.5 lbs/gal)

301.2 Group II Vehicles and Mobile Equipment: A person shall not finish or refinish Group II vehicles and equipment or their parts and components, using any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating as applied, excluding water and exempt compounds (as defined in Rule 102) unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an overall control efficiency (capture and control), as determined in Sections 506.4 and 506.5, of at least 85 percent and which has been approved in writing by the Air Pollution Control Officer. Pursuant to Section 302, any person seeking to utilize such abatement equipment shall submit an Operation and Maintenance Plan at least 90 days in advance of the date on which abatement equipment control is to be used in lieu of compliance with VOC content limitations. Submittal of an application for Authority to Construct per Rule 501, General Permit Requirements, will also be required.

COATING	JANUARY 1, 1996 VOC	JANUARY 1, 1997 VOC	JANUARY 1, 1998 VOC
Pretreatment Wash Primer	780 g/l (6.5 lbs/gal)	780 g/l (6.5 lbs/gal)	780 g/l (6.5 lbs/gal)
Precoat	780 g/l (6.5 lbs/gal)	600 g/l (5.0 lbs/gal)	600 g/l (5.0 lbs/gal)
Primer/Primer Surfacer	340 g/l (2.8 lbs/gal)	340 g/l (2.8 lbs/gal)	250 g/l (2.1 lbs/gal)
Primer Sealer	420 g/l (3.5 lbs/gal)	340 g/l (2.8 lbs/gal)	340 g/l (2.8 lbs/gal)
Topcoat	420 g/l (3.5 lbs/gal)	420 g/l (3.5 lbs/gal)	420 g/l (3.5 lbs/gal)
Metallic Topcoat	420 g/l (3.5 lbs/gal)	420 g/l (3.5 lbs/gal)	420 g/l (3.5 lbs/gal)
Specialty Coating	840 g/l (7.0 lbs/gal)	840 g/l (7.0 lbs/gal)	840 g/l (7.0 lbs/gal)
Camouflage	420 g/l (3.5 lbs/gal)	420 g/l (3.5 lbs/gal)	420 g/l (3.5 lbs/gal)

301.3 Utility Body Requirements: The standards set forth in Section 301.1 shall apply to the coating of utility bodies only when color match is required and the volume of utility bodies to be coated is 20 per day or less. If both of these conditions do not apply, the standards set forth in Section 301.2 shall apply to the coating of utility bodies.

302 OPERATION AND MAINTENANCE PLAN: Any person using air pollution abatement equipment pursuant to Section 301 shall submit an Operation and Maintenance Plan for the emissions control equipment to the Air Pollution Control Officer for approval. The Plan shall specify operation and maintenance procedures which will demonstrate continuous operation and compliance of the emissions control equipment during periods of emissions-producing operations. The Plan shall also specify which daily records must be kept to document these operations and maintenance procedures. These records shall comply with the requirements of Section 504. The Plan shall be implemented upon approval by the Air Pollution Control Officer.

303 TRANSFER EFFICIENCY: Effective January 1, 1998, for all coatings, a person shall not apply any coating to any Group I or II vehicles or mobile equipment or their parts and components unless one of the following methods is used:

- 303.1 Electrostatic application equipment, operated in accordance with the manufacturer's recommendations;
- 303.2 High Volume Low Pressure (HVLP) spray equipment, operated in accordance with the manufacturer's recommendations;
- 303.3 Any other equivalent coating application method which has been demonstrated to have a transfer efficiency of 65% or greater according to the requirements of Section 506.3, Determination of Transfer Efficiency, and which has been submitted to and approved by the Air Pollution Control Officer.

304 SURFACE PREPARATION AND SOLVENT LOSS MINIMIZATION: Any person using organic solvent for surface preparation and cleanup or mixing, using or disposing of coating or stripper containing organic solvent:

- 304.1 Shall use closed, nonabsorbent containers for the storage or disposal of cloth or paper used for solvent surface preparation and cleanup.
- 304.2 Shall store fresh or spent solvent, coating, catalyst, thinner, or reducer in closed containers when not in use.
- 304.3 Shall not, effective January 1, 1997, use organic compounds for the cleanup of spray equipment including paint lines unless an enclosed system or other system that has been approved in writing for use by the Air Pollution Control Officer and submitted to and approved by the Air Resources Board (ARB) and U.S. EPA, is used for cleanup. The system must enclose spray guns, cups, nozzles, bowls and other parts during washing, rinsing and draining procedures. Equipment used shall minimize the evaporation of organic compounds to the atmosphere.
- 304.4 Effective January 1, 1997, the VOC content of surface preparation solvent shall not exceed 72 g/l (0.6 lb/gal), excluding water and exempt compounds. This limit shall not apply to surface preparation material applied from a hand-held spray bottle for the removal of road tar, engine oil, grease, overspray, or adhesives, from the vehicle, or used to clean plastic parts. The VOC content of surface preparation solvent used to remove road tar, engine oil, grease, overspray, or adhesives, from the vehicle, or used to clean plastic parts shall not exceed 780 g/l (6.5 lbs/gal), excluding water and exempt compounds.

305 SPECIALTY COATING: Use of all specialty coatings except antiglare/safety coatings shall not exceed 5.0% of all coatings applied, on a monthly basis.

306 TEMPORARY PROTECTIVE COATING: A person shall not use any temporary protective coating with a VOC content in excess of 60 g/l (0.5 lbs/gal), of material.

307 PRECOAT LIMITATION: A person shall not use precoat in excess of 25%, by volume, of the amount of primer surfacer used, on a monthly basis.

308 HVLP MARKING: Effective April 3, 1995, a person shall not sell or offer for sale for use within the District any HVLP gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Section 218.

400 ADMINISTRATIVE REQUIREMENTS

401 PROHIBITION OF SPECIFICATION: No person shall solicit or require for use or specify the application of a coating on a Group I or II vehicle, mobile equipment, or part or component thereof

if such use or application results in a violation of the provisions of this rule. The prohibition of this Section will apply to all written or oral contracts under the terms of which any coating which is subject to the provisions of this rule is to be applied to any motor vehicle, mobile equipment, or part or component at any physical location within the District.

402 PROHIBITION OF SALE: A person shall not offer for sale or sell within the District any coating if such product is prohibited by any of the provisions of this rule. The prohibition of this section shall apply to the sale of any coating which will be applied at any physical location within the jurisdiction of the local air pollution control agencies. This requirement shall not apply to the application of coatings where emissions to the atmosphere are controlled to an equivalent level of this rule by air pollution abatement equipment with an overall efficiency (capture and control) as determined in Sections 506.4 and 506.5, of at least 85 percent and which has been approved in writing by the Air Pollution Control Officer.

403 VOC COMPLIANCE STATEMENT REQUIREMENT: The manufacturer of coatings subject to this rule shall include a designation of VOC (as defined in Section 238 of this rule) as supplied and as applied, expressed in grams per liter (or pounds per gallon), excluding water and exempt compounds, on data sheets. The manufacturer of temporary protective coatings shall indicate the VOC designation as grams per liter (or pounds per gallon) of material.

404 CALCULATION FOR VOC MASS EMISSION RATE AND CONTROL EFFICIENCY: The VOC mass emission rate shall be calculated both upstream and downstream of the emissions control device based on the respective VOC mass concentration and volumetric flowrate, pursuant to Section 506.4 and the following equation:

$$M = (Q)(C)(60 \text{ min/hr})$$

Where: M = VOC mass emission rate, in lb/hr.
Q = The volumetric flowrate of the exhaust stack, in scfm.
C = The VOC mass concentration, in lb/scf, as measured by EPA

The percent control efficiency is calculated as follows:

$$\% \text{ CE} = [(MU - MD) / MU] \times 100$$

Where: CE = Control efficiency.
MU = The upstream VOC mass emission rate, in lb/hr.
MD = The downstream VOC mass emission rate, in lb/hr.

500 MONITORING AND RECORDS

501 USER COATING RECORDS: Operators of facilities subject to this Rule shall maintain a current listing of all as-applied VOC containing materials in use at their facility. This listing shall include:

- a. material name and manufacturer identification;
- b. application method;
- c. material type, group number (I or II) and specific use instructions (such as "precoat must be applied to bare metal and followed with a compliant primer");
- d. specific mixing instructions;
- e. maximum VOC content of coatings as applied (including reducing solvents);

Current coating manufacturing specification sheets, material data sheets or current air quality data sheets, which list the VOC content of each material, shall be available for review on site. A record of the total facility VOC emissions shall be maintained on a monthly basis. These

records shall be summarized for the previous calendar year and submitted to the District by June 1. Such records shall be retained and available for inspection by the District for the previous three (3) year period, except for sources subject to Rule 507, Federal Operating Permit Program, which shall retain records for five (5) years.

502 HIGH VOC EMISSIONS: If VOC emissions for any calendar year exceed 10,000 pounds, record-keeping requirements in addition to those listed in Section 501, will be required per Rule 511, Potential to Emit.

503 PRECOAT LIMITATION RECORDS: Any person using precoat shall verify compliance with Section 307 by retaining purchase invoices and records of applied volume of precoat on a monthly basis. Such records shall be retained for the previous three (3) year period and made available for inspection upon request.

504 EMISSION CONTROL EQUIPMENT RECORDS: Any person using emissions control equipment pursuant to Section 302 as a means of complying with this rule shall maintain such records as required by the Operation and Maintenance Plan in Section 302 on a daily basis, to include such records as required by Sections 501, 502, and 503.

505 SALES RECORDS: Any person within the District selling coatings subject to this Rule shall make receipts of customer purchases available for inspection upon request. Cash sales shall be recorded including the customer's name and business card. This information can be submitted to the District in electronic data form.

506 TEST METHODS:

506.1 Analysis of Samples: Samples of volatile organic compounds as specified in Sections 301.1, and 301.2, of this rule shall be analyzed as prescribed by EPA Reference Method 24.

506.2 Determination of Emissions: Emissions of volatile organic compounds as specified in Section 301.1, and 301.2, of this rule shall be measured as prescribed by EPA Reference Method 25.

506.3 Determination of Transfer Efficiency: Transfer efficiency as required by Section 302, of this rule shall be determined in accordance with the South Coast Air Quality Management District (SCAQMD) test method for determining transfer efficiency entitled, "Spray Equipment Transfer Efficiency (TE) Test Procedure for Equipment User, May 24, 1989," or other equivalent method which has been approved in writing by the Air Pollution Control Officer and submitted to and approved by U.S. EPA.

506.4 Determination of Control Efficiency: Control efficiency as required by Sections 301.1 and 301.2 of this rule, shall be determined in accordance with EPA Method 18, 25, 25A, EPA Method 2 or 2C (whichever is applicable), and Section 404.

506.5 Determination of Capture Efficiency: Capture efficiency as required by Section 301.1, and 301.2, of this rule shall be determined by and reported in accordance with 40 CFR 52.741, Appendix B, "VOC Measurement Techniques for Capture Efficiency".

506.6 Determination of Metallic Particles in Metallic Coating Topcoat: Metallic particles in metallic coating topcoat as defined, in Section 222, of this rule shall be determined by the South Coast Air Quality Management District (SCAQMD) Method 311 Analysis of Percent Metal in Metallic Coatings by Spectrographic Method contained in the SCAQMD "Laboratory Method of Analysis for Enforcement Samples" manual.

- 506.7 Determination of Acid Concentration in Pretreatment Wash Primer: Acid concentration in pretreatment wash primer as defined in Section 226, of this rule shall be determined by ASTM Test Method D-1613-85 (modified).